

From: "Jason Goodman" <truth@crowdsourcethetruth.org>
Date: Sunday, March 08, 2020 11:42 AM
To: "Steven Biss" <stevenbiss@earthlink.net>
Cc: "Terry Frank" <tcfrank@kaufcan.com>; "Robert David Steele" <robert.david.steele.vivas@gmail.com>
Subject: Re: Final Pretrial Order

In direct conflict with court orders, you are not being cooperative Mr. Biss. There is no way the MS Word file use to create the PDF you emailed is "too big to email" unless you have deliberately embedded unnecessarily large files for the express purpose of being uncooperative and malicious, which is how you have behaving every day of this protracted and frivolous proceeding. Tell the judge whatever you want, but spare me your disingenuous lectures on legal ethics and figure out how to email the MS word file. You have already been instructed that High Tail is an unacceptable format. You continue to fail to make GOOD FAITH efforts in the course of this settlement procedure and it is my belief the court will be more interested in that, than in my repeated instructions that you DO NOT continue to behave in ways you have been instructed not to. STOP INCLUDING YOUR CLIENT ON EMAILS TO COUNSEL.

On Mar 8, 2020, at 11:29 AM, Steven S. Biss <stevenbiss@earthlink.net> wrote:

Jason,

I am going to print out everyone of these insulting emails, so the Judges can see what kind of abuse you are dishing out. This is not acceptable behavior in the Eastern District of Virginia.

The file size is 27,918 KB.

Please stop the personal attacks immediately. The parties have a lot of work to get done together before trial.

From: Jason Goodman
Sent: Sunday, March 08, 2020 11:09 AM
To: Steven Biss
Cc: Terry Frank ; Robert David Steele
Subject: Re: Final Pretrial Order

How can a Microsoft word file be too big to email Biss? I find that implausible and dishonest. What is the file size?

On Mar 7, 2020, at 8:25 PM, Steven S. Biss <stevenbiss@earthlink.net> wrote:

Jason/Terry,

Attached in PDF is a draft of the Joint [Proposed] Final Pretrial Order, which is currently due to be filed on 3/12.

Please review, and email me your respective sections in Word, so I can incorporate them in the document. Also let me know if you have any changes or additions to the stipulations.

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<Joint Proposed Final Pretrial Order - DRAFT - 3.7.20.pdf>